



BellSouth Telecommunications, Inc.  
214-214-2141  
214-214-2141  
214-214-2141  
214-214-2141

May 23, 2000

**VIA HAND DELIVERY**

Mr. David Waddell, Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243

Re: *Request for Temporary Waiver of Physical Collocation in the Brentwood Central*  
*Office*  
Docket No. ~~00-00358~~ 00-00357

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of BellSouth Telecommunications, Inc.'s Petition for Temporary Waiver.

The affected applicants have been provided with a copy of the Petition for Temporary Waiver. Thank you for your attention to this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "Guy M. Hicks".

Guy M. Hicks

GMH/jem

Enclosure

BEFORE THE TENNESSEE REGULATORY AUTHORITY  
Nashville, Tennessee

In Re:       *Request for Temporary Waiver of Physical Collocation in the Brentwood Central Office.*

Docket No. 00-00358

**PETITION FOR TEMPORARY WAIVER**

BellSouth Telecommunications, Inc. ("BellSouth"), files this Petition for Temporary Waiver in accordance with the Telecommunications Act of 1996 (the "Act") and applicable Federal Communications Commissions ("FCC") Orders<sup>1</sup> (the "Orders"). Pursuant to this authority, BellSouth requests an exemption from the physical collocation requirements set forth in the Act and in the Orders for the Brentwood Central Office ("CO") located at 102 High Lea Road, Brentwood, Tennessee, 37027. BellSouth seeks this exemption from the Tennessee Regulatory Authority ("TRA") on the grounds that it is unable to meet the Applicant's physical collocation request due to space limitations in the CO. BellSouth expects to construct an addition to the CO building, although BellSouth has no obligation to lease or construct additional space to provide physical collocation to interconnectors when existing space has been exhausted.

1.       The Brentwood CO building houses switches providing local dial tone. Circuit equipment also located in the CO includes fiber optic terminals, digital cross-connect systems, multiplexers, digital channel banks, subscriber carrier terminals, and digital cross connect panels. The circuit equipment provides connectivity to other CO's and local customers. Rectifiers and battery strings provide power to the above equipment.

---

<sup>1</sup>       1996 Telecommunications Act, Section 251(c) (6); FCC's First Report and Order, Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, CC Docket No. 96-98, Released August 8, 1996, Paragraphs 602-607.

BellSouth anticipates constructing an addition to the central office that will be used for future physical collocation as well as the growth of power, switch and circuit equipment. The estimated completion date of the addition is the end of the first quarter 2001.

2. Under the Act, Incumbent Local Exchange Companies ("ILECs") have the following obligation:

The duty to provide, on rates, terms, and conditions that are just, reasonable, and nondiscriminatory, for physical collocation of equipment necessary for interconnection or access to unbundled network elements at the premises of the local exchange carrier, except that the carrier may provide for virtual collocation if the local exchange carrier demonstrates to the State Commission that physical collocation is not practical for technical reasons or because of space limitations.

47 U.S. § 251(c)(b). Thus, an ILEC is required to provide collocation unless it is "not practical...because of space limitations." *Id.* The term "space limitations" encompasses two factors: first, ILECs are entitled to consider space already in use by the ILEC at the time the collocation request is made; second, ILECs are entitled to "retain a limited amount of floor space for defined future uses" (Order, ¶604). Without the latter element, competitive entrants "could prevent incumbent LECs from serving their customers effectively." *Id.*

3. Due to space limitations in the Brentwood CO, BellSouth is unable to provide physical collocation to additional competitive local exchange carriers ("CLECs"). There will be no room for additional physical collocation until the anticipated building addition is completed. The space limitations faced by BellSouth are the result of the use of space for existing BellSouth equipment, existing CLEC equipment, and the planned installation of additional equipment essential to the effective service of BellSouth customers.

4. In an effort to identify space currently available for physical collocation, BellSouth employed the following procedure:

1. BellSouth determined in the total square footage within the facility;
2. BellSouth determined the unavailable space (i.e., restrooms, hallways, stairs, etc.);
3. BellSouth determined assigned space currently occupied by the BellSouth switch, transmission, power and other equipment, as well as necessary administrative space;
4. BellSouth determined the space reserved for future defined uses necessary to adequately serve BellSouth customers, including consideration given to BellSouth's future switch growth plans;
5. BellSouth identified any unusable space (such as basements subject to flooding); and
6. BellSouth determined available collocation space by subtracting items 2-5 from item 1.

**A. Current Space Allocation**

1. Allocation of space:

The facility currently has a total of 13,535 square feet occupied as follows:

| <u>Square Footage</u> | <u>Description</u>  |
|-----------------------|---|
| Unavailable Space:    |   |
| 3,497                 | Entrance lobby, Main Corridors, Hall spaces, inside stairways, fire towers, vertical shafts, restrooms, and all space necessary for building operation (i.e., HVAC mechanical rooms). |
| Occupied Space:       |   |
| 2,560                 | Switching Systems   |
| 3,367                 | Transmission Equipment  |
| 1,470                 | Power Equipment   |
| 1,676                 | Collocation   |

|     |  |
|-----|--|
| 404 | Engine Rooms   |
| 193 | Storage  |
| 368 | Administrative (limited to space necessary for personnel who work in the building) |

TOTAL: 10,038

When totaled, the Unavailable Space and the Occupied Space equals 13,535 the square footage of the entire CO.

5. As previously stated, BellSouth's thorough assessment of the facility confirmed that there is no space available for additional physical collocation until the addition is completed. Attached hereto is the space assessment worksheet that details the procedure set forth above. (Exhibit 1). Also attached hereto as Exhibit 2 are floor plans of the CO which show the present and future use as well as a planning grid. One applicant toured the CO as evidenced by the sign-in sheet attached as Exhibit 3.<sup>2</sup> The other applicant declined the opportunity to tour the CO.

6. There is space reserved for defined future use for BellSouth which may be insufficient to meet the growing needs of its customers through the year 2000. The projects include incremental additions to the existing switching system, frame and transmission equipment. These projects will use the remaining space in the facility.

7. The Brentwood CO contains no available space for physical collocation for the applicant and for this reason should be excluded from the collocation requirements. BellSouth will, of course, offer virtual collocation in the Brentwood CO. Having demonstrated good cause for its requests, BellSouth asks that the TRA grant its petition for Waiver and exempt BellSouth from the obligation to offer physical collocation in the Brentwood CO.

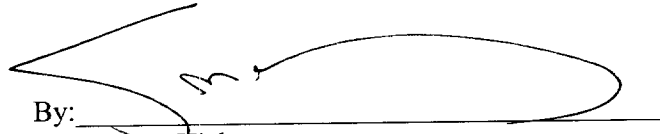
---

<sup>2</sup> The name of the applicant has been redacted to avoid publicly disclosing the identity of the applicant in this proceeding.

This 23<sup>rd</sup> day of May, 2000.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.

A handwritten signature in black ink, appearing to read "Guy M. Hicks", is written over a horizontal line. The signature is stylized with a large loop at the end.

By:

Guy M. Hicks  
333 Commerce Street, Suite 2101  
Nashville, Tennessee 37201-3300  
615/214-6301

R. Douglas Lackey  
675 W. Peachtree Street NE, Suite 4300  
Atlanta, Georgia 30375  
404/335-0747

## **EXHIBIT 1**

### **SPACE ASSESSMENT WORKSHEET**

[illegible]





|   |  |  |  |  |  |  |  |  |  |  |  |
|---|--|--|--|--|--|--|--|--|--|--|--|
| TOTAL UNUSABLE VACANT SPACE   |  |  |  |  |  |  |  |  |  |  |  |
| NET AVAILABLE SPACE   |  |  |  |  |  |  |  |  |  |  |  |
| F. FUTURE AVAILABLE SPACE   |  |  |  |  |  |  |  |  |  |  |  |
| Completion of switch replacement (date):  |  |  |  |  |  |  |  |  |  |  |  |
| Removal of retired equipment (date):  |  |  |  |  |  |  |  |  |  |  |  |
| Other (explain): (date):  |  |  |  |  |  |  |  |  |  |  |  |
| IF PHYSICAL SPACE IS UNAVAILABLE, VIRTUAL SHOULD BE OFFERED.<br>(Explain in detail if Virtual Collocation Space is unavailable)   |  |  |  |  |  |  |  |  |  |  |  |
| Explanation:  |  |  |  |  |  |  |  |  |  |  |  |
|   |  |  |  |  |  |  |  |  |  |  |  |
|   |  |  |  |  |  |  |  |  |  |  |  |
| Form completed by: L. D. Osborne  |  |  |  |  |  |  |  |  |  |  |  |
| Telephone no: 615-214-5652  |  |  |  |  |  |  |  |  |  |  |  |
| Date:   |  |  |  |  |  |  |  |  |  |  |  |
| Approved: _____<br>(PG59 Manager)   |  |  |  |  |  |  |  |  |  |  |  |
| <p>Note: 1 - Use Section D, Other Reserved Space, to address space reservation requirements beyond documented Current Year + 1 growth forecasts. Technical requirements associated with isolated ground planes, digital switch bus lengths, DF growth, etc. may require space reservation beyond the standard 2 year limit. Provide sufficient explanation to justify the reserved space.</p> |  |  |  |  |  |  |  |  |  |  |  |

**EXHIBIT 2**  
**FLOOR PLANS**

**EXHIBIT 3**

**CO TOUR SIGN-IN SHEET**

## Memorandum For Record

On March 28, 2000, Larry Osborne of BellSouth conducted a tour of the Nashville Brentwood Central Office equipment building in Brentwood, Tennessee.

### Attendees

| Name                   | Company & Title          | Date           |
|------------------------|--------------------------|----------------|
| <u>Larry Osborne</u>   | <u>Mgr. - CSCM - BST</u> | <u>3/28/00</u> |
| <u>John A. Redwine</u> | <u></u>                  | <u>3/28/00</u> |
| <u></u>                | <u></u>                  | <u></u>        |
| <u></u>                | <u></u>                  | <u></u>        |
| <u></u>                | <u></u>                  | <u></u>        |
| <u></u>                | <u></u>                  | <u></u>        |